

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

DENNIS BALL-BEY,	)	
	)	
Plaintiff,	)	
	)	Cause No. 4:18-CV-01364
v.	)	
	)	
KYLE CHANDLER, <i>et al.</i>	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF LAWRENCE L. PRATT**

I, Lawrence L. Pratt, duly declare, pursuant to 28 U.S. Code §1746 the following:

1. I am one of the attorneys of record representing Defendants in the above-referenced case.

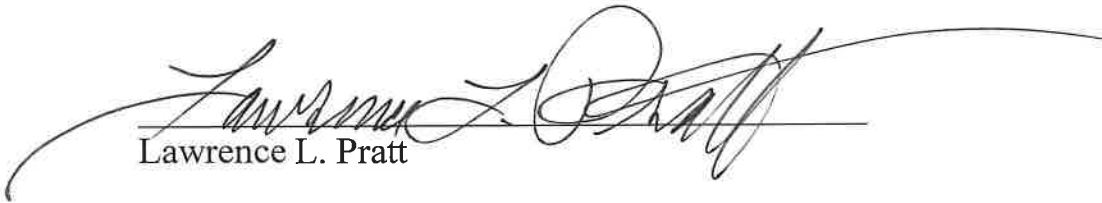
2. May 18, 2023 is the first record I have of Plaintiff's counsel inquiring about the depositions of Officers McClosky, Owens, or Porter.

3. Plaintiff did serve his 4<sup>th</sup> Request for Production of Documents by email to my email address on April 4, 2023 after 5:00 p.m. I receive a great deal of email correspondence on a daily basis. As such, I did not see Plaintiff aforesaid email the next day and was unaware of it until Plaintiff filed his Motion To Compel Discovery.

4. Plaintiff's counsel never called any defense counsel that I am aware of "several times" relative to any discovery dispute. Plaintiff's counsel did leave me a telephone message relative to discovery the afternoon of Friday May 26, 2023. I did not receive this message until I had returned to the office on Wednesday, May 31, 2023 after the Memorial Day holiday.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2<sup>nd</sup> day of June, 2023.



Lawrence L. Pratt